

# **Exhibit AA**

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 Eastern Profit CORPORATION LIMITED,

5 Plaintiff,

6 -against- Case No. 18-cv-2185 (JGK)

7 Strategic Vision US, LLC,

8 Defendant.

9 -----x

10 August 2, 2019

11 9:51 a.m.

12

13 Deposition of GUO WENGUI, held at the offices of Hodgson  
14 Russ, 605 Third Avenue, Suite 2300, New York, New York,  
15 pursuant to Notice, before Renate Reid, Registered Professional  
16 Reporter and Notary Public of the State of New York.

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Guo Wengui  
August 2, 2019

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<p>1 <b>Guo Wengui</b></p> <p>2 A. Yes, many.</p> <p>3 <b>Q. Who installed them?</b></p> <p>4 A. Security companies and the hotel</p> <p>5 management company. And, also, some of them came 10:19</p> <p>6 with the purchase of this apartment,</p> <p>7 pre-installed.</p> <p>8 <b>Q. What security company installed</b></p> <p>9 <b>microphones and cameras in your apartment?</b></p> <p>10 A. I can't recall the name of that 10:20</p> <p>11 company.</p> <p>12 <b>Q. Is it T&amp;M Security?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Do you have access to the recordings</b></p> <p>15 <b>that are made by the microphones or cameras?</b> 10:20</p> <p>16 MR. HARMON: Object to the form of the</p> <p>17 question.</p> <p>18 A. No. Personally, no.</p> <p>19 BY MR. GREIM:</p> <p>20 <b>Q. So is it your testimony that</b> 10:21</p> <p>21 <b>microphones and cameras installed in your</b></p> <p>22 <b>apartment are able to record conversations in your</b></p> <p>23 <b>apartment, but you're not able to access the</b></p> <p>24 <b>recordings?</b></p> <p>25 MR. HARMON: Object to the form of the 10:21</p>	<p>1 <b>Guo Wengui</b></p> <p>2 figure out that question. I don't know.</p> <p>3 BY MR. GREIM:</p> <p>4 <b>Q. Can Yvette Wang access the recordings?</b></p> <p>5 MR. HARMON: Object to the form of the 10:23</p> <p>6 question.</p> <p>7 A. I don't know.</p> <p>8 BY MR. GREIM:</p> <p>9 <b>Q. Can -- can Golden Spring access the</b></p> <p>10 <b>recordings?</b> 10:24</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. I don't know.</p> <p>14 BY MR. GREIM:</p> <p>15 <b>Q. Can Eastern Profit access the</b> 10:24</p> <p>16 <b>recordings?</b></p> <p>17 MR. HARMON: Object to the form of the</p> <p>18 question.</p> <p>19 A. No. I don't know.</p> <p>20 BY MR. GREIM:</p> <p>21 <b>Q. Isn't it true that some of these</b></p> <p>22 <b>recordings have appeared on the Internet?</b></p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 A. I don't know.</p>
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<p>1 Guo Wengui  2 <b>Q. In the last four years.</b>  3 A. You mean ever listen or view? I can't  4 recall. I can't recall.  5 <b>Q. Have the cameras and microphones ever</b> 10:26  6 <b>been active?</b>  7 A. I don't know.  8 <b>Q. So do you believe that the</b>  9 <b>Sherry-Netherland is recording your actions and</b>  10 <b>discussions in your apartment?</b> 10:27  11 MR. HARMON: Object to the form of the  12 question.  13 A. I don't know.  14 BY MR. GREIM:  15 <b>Q. Do you currently -- strike that.</b> 10:27  16 <b>Have you retained a security company to</b>  17 <b>take the place of T&amp;M Security?</b>  18 A. No.  19 <b>Q. I want to be sure that this part of</b>  20 <b>your testimony is clear.</b> 10:28  21 MR. HARMON: Wait. There's no question  22 yet.  23 MR. GREIM: Go ahead. Translate what  24 he said.  25 A. That's your way of asking questions. 10:28</p>	<p>1 Guo Wengui  2 the judge.  3 BY MR. GREIM:  4 <b>Q. Okay. I am seeking your understanding.</b>  5 A. So you can just ask me questions 10:31  6 directly, because we're not -- you don't need to  7 know much about me, you know, because we're not  8 dating.  9 <b>Q. Is it your belief that you do not have</b>  10 <b>the authority to access recordings made in your</b> 10:31  11 <b>apartment?</b>  12 MR. HARMON: Object to the form of the  13 question.  14 A. I don't know, because this question, I  15 need to refer to my -- refer this question to my 10:32  16 counsel.  17 BY MR. GREIM:  18 <b>Q. Have you tried to determine whether you</b>  19 <b>have authority to access recordings made in your</b>  20 <b>apartment?</b> 10:32  21 MR. HARMON: Object to the form.  22 A. No.  23 BY MR. GREIM:  24 <b>Q. Now I'm going to ask about physical</b>  25 <b>access.</b> 10:32</p>
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<p>1 Guo Wengui  2 I'm just doing my job.  3 CHECK INTERPRETER: I'm only here to  4 answer questions.  5 BY MR. GREIM: 10:29  6 <b>Q. So I'm now going to ask you a question</b>  7 <b>that will distinguish between the authority to</b>  8 <b>access recordings and the physical ability to</b>  9 <b>access recordings.</b>  10 <b>Is it your testimony today that you do</b> 10:29  11 <b>not have the legal authority to access recordings,</b>  12 <b>video or audio recordings, made in your apartment?</b>  13 MR. HARMON: Object to the form of the  14 question.  15 A. So it depends on, you know, the legal 10:30  16 system here in the U.S. You are not the judge, so  17 you cannot decide whether --  18 BY MR. GREIM:  19 <b>Q. I -- I --</b>  20 MR. HARMON: Go ahead. Get a 10:30  21 translation, unless you secretly understand  22 Chinese.  23 A. So you are the legal counsel for the  24 defendant, and you cannot dictate who has access  25 and who does not have access. Everything is up to 10:31</p>	<p>1 <b>Guo Wengui</b>  2 <b>Have you tried to physically access</b>  3 <b>recordings of conversations in your apartment in</b>  4 <b>the last four years?</b>  5 MR. HARMON: Object to the form of the 10:33  6 question.  7 A. No.  8 BY MR. GREIM:  9 <b>Q. Do you know whether any intelligence</b>  10 <b>service has installed cameras or microphones in</b> 10:33  11 <b>your apartment?</b>  12 A. I don't know.  13 <b>Q. Have you claimed that an intelligence</b>  14 <b>service has installed cameras or microphones in</b>  15 <b>your apartment? (DIR)</b> 10:33  16 MR. HARMON: Direct the witness not to  17 answer.  18 Next question, please.  19 BY MR. GREIM:  20 <b>Q. Do you refuse to answer that question?</b> 10:34  21 A. Yes, I refuse.  22 <b>Q. Have you made that statement to French</b>  23 <b>Wallop or Michael -- Michael Waller? (DIR)</b>  24 MR. HARMON: Direct the witness --  25 direct the witness not to answer. 10:34</p>
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<p>1 Guo Wengui  2 BY MR. GREIM:  3 <b>Q. The witness is nodding your head.</b>  4 <b>By that, do you mean that you will not</b>  5 <b>answer?</b> 10:34  6 A. I do not answer this question.  7 <b>Q. Are you aware whether your</b>  8 <b>conversations in May of 2017 with agents of the</b>  9 <b>Chinese Communist Party and the People's Republic</b>  10 <b>of China were recorded and placed on the Internet? (DIR)</b> 10:35  11 MR. HARMON: Direct the witness not to  12 answer the question.  13 A. I don't want to answer this question.  14 BY MR. GREIM: 10:36  15 <b>Q. Have you had any conversations with</b>  16 <b>members of the Chinese Communist Party or the</b>  17 <b>People's Republic of China -- I'm sorry. Let me</b>  18 <b>strike that and start again.</b>  19 <b>Have you had any conversations with</b> 10:36  20 <b>members of the Chinese Communist Party or</b>  21 <b>officials of the People's Republic of China</b>  22 <b>regarding the research efforts for which Strategic</b>  23 <b>Vision was hired? (DIR)</b>  24 MR. HARMON: Direct the witness not to 10:36 </p>	<p>1 <b>Guo Wengui</b>  2 <b>question?</b>  3 A. I refuse to answer the question.  4 MR. HARMON: Again, when -- when I  5 intend to direct you not to answer -- 10:38  6 THE WITNESS: I understand.  7 MR. HARMON: Okay.  8 BY MR. GREIM:  9 <b>Q. So are you refusing to answer the</b>  10 <b>question, even though counsel has not directed you</b> 10:38  11 <b>not to answer?</b>  12 MR. HARMON: The answer would be "yes"  13 or "no"; not whether she is or isn't, but whether  14 you know.  15 A. I know her identity. 10:39  16 BY MR. GREIM:  17 <b>Q. My question was not whether you know</b>  18 <b>her identity.</b>  19 <b>My question was whether you know whether</b>  20 <b>she is a member of the Chinese Communist Party.</b> 10:39  21 MR. HARMON: "Yes" or "no."  22 A. I know.  23 BY MR. GREIM:  24 <b>Q. And just to be clear, is that a "yes"</b>  25 <b>to my question?</b> 10:40 </p>
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<p>1 Guo Wengui  2 answer.  3 A. I refuse to answer this question.  4 BY MR. GREIM:  5 <b>Q. Have you had conversations with Yvette</b> 10:37  6 <b>Wang regarding the research efforts for which</b>  7 <b>Strategic Vision was hired?</b>  8 MR. HARMON: Object to the form of the  9 question.  10 A. I refuse to answer this question. 10:37  11 MR. HARMON: Okay. So -- so once  12 again, please advise the witness that when I  13 object to the form, it's not a direction for him  14 not to answer. When I intend to direct him not to  15 answer, I will do so directly. 10:37  16 A. Of course, I had discussions with  17 Yvette.  18 BY MR. GREIM:  19 <b>Q. Is Yvette Wang a member of the Chinese</b>  20 <b>Communist Party? (DIR)</b> 10:38  21 MR. HARMON: Object to -- I'm sorry.  22 Direct the witness not to answer.  23 A. I refuse to answer this question.  24 BY MR. GREIM:  25 <b>Q. Do you know the answer to that</b> 10:38 </p>	<p>1 <b>Guo Wengui</b>  2 MR. HARMON: Which question?  3 MR. GREIM: He answered "I know" to my  4 question. You asked him to say "yes" or "no." He  5 said "I know." I'm going to make sure it's clear  6 in the transcript that his answer is "yes." 10:40  7 MR. HARMON: I just want to be clear.  8 So the -- the question is, Do you know  9 whether or not Yvette is a member of the Communist  10 Party? Yes or no. 10:40  11 A. I know. I know.  12 INTERPRETER: He said, "I know."  13 He said I'm doing a good job, he said.  14 BY MR. GREIM:  15 <b>Q. Have you discussed with French Wallop</b> 10:40  16 <b>or Mike Waller Yvette Wang's membership in the</b>  17 <b>Communist Party?</b>  18 MR. HARMON: Object to the form of the  19 question.  20 Do you mean whether or not she's a 10:41  21 member? because the way you phrased the question  22 assumes that she is.  23 MR. GREIM: I -- I do mean whether or  24 not. I meant the subject of --  25 MR. HARMON: Thank you. 10:41 </p>
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<p>1 Guo Wengui 2 tried by the rule of law. 3 MR. GRENDI: Do we have to go off the 4 record here? Do we need to go off the record here 5 regarding translation? because it seems to me 6 there's a recurring theme here where the 7 translator is missing something and we're getting 8 a correction here. And he's not contesting it. 9 MR. GREIM: I disagree. I don't think 10 we have a problem. We've only had a few 11 corrections, and we're fixing it as we go. 12 MR. HARMON: Lord knows, Zach, that 13 I -- I hate to agree with Eddie; but, in fact, I 14 don't think there's a problem until we run into a 15 situation where our private translator corrects an 16 error and the official translator disagrees with 17 her. So as long as -- as you pointed out, Zach, 18 as long as the correction is made and not 19 contested, then I think we all agree that the 20 corrected testimony is the testimony that was 21 given. 22 Is that fair to say? 23 MR. GRENDI: I'm fine with that. I'm 24 just noting my concern for the record. 25 MR. HARMON: Okay. Is that fair to</p>	<p>10:49 10:49 10:49 10:49 10:50</p>	<p>1 <b>Guo Wengui</b> 2 A. Between -- I don't recall the exact 3 dates, but it's probably between November 2017 and 4 February 2018, when we signed the contract. 5 <b>Q. Have you engaged anyone other than</b> 6 <b>Strategic Vision to accomplish the goal that you</b> 7 <b>described to us? (DIR)</b> 8 MR. HARMON: Direct the witness not to 9 answer. 10 A. I refuse to answer this question. 11 BY MR. GREIM: 12 <b>Q. After your contract with Strategic</b> 13 <b>Vision was terminated, did you engage any other</b> 14 <b>entity to provide the services that you sought</b> 15 <b>from Strategic Vision? (DIR)</b> 16 MR. GRENDI: Object to the form of the 17 question. 18 MR. HARMON: Object to the form of the 19 question and direct the witness not to answer. 20 A. I refuse to answer. 21 MR. GREIM: Videographer, can you catch 22 the witness in a standing position? All right. 23 BY MR. GREIM: 24 <b>Q. Okay. During the time that Strategic</b> 25 <b>Vision was working on its project for you, did you</b></p>	<p>10:53 10:53 10:53 10:54 10:54 10:55</p>
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<p>1 Guo Wengui  2 BY MR. GREIM:  3 <b>Q. Let me ask you this question: Where</b>  4 <b>did you obtain the 15 names that you or Mrs. Wang</b>  5 <b>gave to Strategic Vision to research?</b> 10:57  6 A. First of all, I need to tell you, I did  7 not provide even one name.  8 <b>Q. Do you know who provided the 15 names</b>  9 <b>to French Waller and Mike Wallop -- French Wallop</b>  10 <b>and Mike Waller?</b> 10:57  11 A. Yvette.  12 <b>Q. Did you tell French Wallop and Mike</b>  13 <b>Waller that you had paid over \$200 million for</b>  14 <b>those names?</b>  15 INTERPRETER: You would pay, right? 10:58  16 Not pay, but you would pay?  17 MR. GREIM: You had paid.  18 INTERPRETER: You had paid.  19 CHECK INTERPRETER: Counsel, did you  20 say 200 million? 10:58  21 INTERPRETER: 200 million.  22 A. It's a big lie. Never. It's a big,  23 super lie.  24 BY MR. GREIM:  25 <b>Q. Do you know how the 15 names were</b> 10:58 </p>	<p>1 Guo Wengui  2 MR. HARMON: Object to the form of the  3 question.  4 A. So we're going to send these reports to  5 the U.S. courts so that people who got persecuted 11:01  6 would know the truth.  7 BY MR. GREIM:  8 <b>Q. Mr. Guo, is -- do you know where</b>  9 <b>Eastern Profit obtained the 15 names?</b>  10 A. No, I don't. 11:02  11 <b>Q. Did you approve the use -- strike that.</b>  12 <b>Did you approve the 15 names before they</b>  13 <b>were provided to Strategic Vision?</b>  14 MR. GRENDI: Object to the form.  15 A. No. 11:02  16 BY MR. GREIM:  17 <b>Q. Did you review the results of Strategic</b>  18 <b>Vision's research?</b>  19 A. They never produced a report. All  20 lies, zero. So all I got was a USB drive with 11:02  21 Facebook posts and rumors gathered from the  22 Internet. It's all lies. So I don't consider  23 whatever they gather from Facebook can constitute  24 as report. So, as a result, I never received a  25 report. Very low, very despicable liars. 11:03 </p>
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<p>1 <b>Guo Wengui</b>  2 <b>obtained?</b>  3 A. No.  4 <b>Q. Who chose the 15 names?</b>  5 A. I don't know. 10:58  6 <b>Q. Do you know whether Yvette Wang chose</b>  7 <b>the 15 names?</b>  8 A. I don't know.  9 <b>Q. What did you intend to do with the</b>  10 <b>research that Strategic Vision was going to</b>  11 <b>provide?</b> 10:59  12 MR. HARMON: Object to the form of the  13 question.  14 MR. GRENDI: Object to form.  15 A. The simple reason is, we want to 10:59  16 eliminate the Chinese Communist Party. We try to  17 overthrow the Chinese Communist Party, to bring  18 rule of law to China, to let the West know the  19 scenes committed by the Chinese Communist Party.  20 BY MR. GREIM: 11:00  21 <b>Q. My question was more specific.</b>  22 <b>What did you intend to do with the</b>  23 <b>research that Strategic Vision uncovered regarding</b>  24 <b>the 15 names?</b>  25 MR. GRENDI: Object to the form. 11:00 </p>	<p>1 Guo Wengui  2 <b>Q. Did you receive information on the same</b>  3 <b>15 individuals from anyone else in 2018? (DIR)</b>  4 MR. HARMON: Direct the witness not to  5 answer. 11:04  6 A. I refuse to answer this question.  7 BY MR. GREIM:  8 <b>Q. Did Eastern Profit receive information</b>  9 <b>regarding the 15 individuals from any other source</b>  10 <b>in 2018?</b> 11:04  11 A. I don't know.  12 <b>Q. Did Eastern Profit receive any</b>  13 <b>information on the 15 individuals in 2017?</b>  14 A. I don't know.  15 <b>Q. Why did you expect to receive useful</b> 11:05  16 <b>results regarding these 15 individuals?</b>  17 MR. HARMON: Object to the form of the  18 question.  19 MR. GRENDI: Object to the form of the  20 question. 11:05  21 INTERPRETER: Can you say that again,  22 the question.  23 BY MR. GREIM:  24 <b>Q. Why did you expect to receive useful</b>  25 <b>results with respect to these 15 individuals?</b> 11:05 </p>
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<p>1 Guo Wengui  2 release those information to the U.S. government  3 to help save millions of peoples who got falsely  4 persecuted in China, even hundreds of millions of  5 people who got persecuted in China. And because  6 of this lying pitch, we lost a wonderful  7 opportunity to rescue all these millions and tens  8 of millions of people who got thrown into jail for  9 no reason.</p> <p>10 So, essentially, these two people, these  11 two individuals, took advantage of our sense of  12 urgency to rescue millions, tens of millions of  13 people, from the prison, and they used those  14 people as bait to try to get us into sign the  15 contracts. And those two people -- those two  16 individuals are really despicable and very low.</p> <p>17 CHECK INTERPRETER: The check  18 interpreter wanted to raise one question with the  19 actual interpreter to see whether he can agree to  20 that. I don't believe that the witness said, "I  21 know some of the names amongst those 15 names." I  22 think that he said, I don't know those 15 names,  23 but I know the names of just Wang Qishan  24 goddaughter, Wang Qishan head of the intelligence.  25 So if I -- those are the people that -- you know,</p>	<p>1 <b>Guo Wengui</b>  2 <b>some of the 15 names before they were given to</b>  3 <b>Strategic Vision?</b>  4 A. Yes.  5 MR. GREIM: I also want to be clear  6 about something in the translation just now. A  7 comment by the witness was -- in the transcript  8 appears as "lying pitch," referring to someone.  9 BY MR. GREIM:  10 <b>Q. Was that actually "lying bitch"?</b>  11 A. No.  12 INTERPRETER: No, he did not use that.  13 A. I'm not as despicable as the other  14 party. I did not use "bitch." "Pitch," I said.  15 VIDEOGRAPHER: The time is  16 approximately 11:17 a.m., Friday, August 2, 2019.  17 This is the end of media number 1 of the  18 videotaped deposition of Mr. Guo Wengui. We are  19 off the record.  20 (Recess taken.)  21 VIDEOGRAPHER: The time is  22 approximately 11:36 a.m., Friday, August 2, 2019.  23 This is media number 2 of the videotaped  24 deposition of Mr. Guo Wengui. We are back on the  25 record.</p>
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<p>1 Guo Wengui  2 something like that. I don't think that he said,  3 actually, I know the names among the 15 names.  4 Did you hear that?  5 INTERPRETER: I think I heard that.  6 And -- so what's the procedure?  7 MR. GREIM: Why don't we do this: Let  8 me just ask the witness that as a separate  9 question, and we'll get an answer. And we'll ask  10 only that question and ask for -- just for an  11 answer to that part, so that -- and it's hard to  12 translate, you know, paragraphs and paragraphs at  13 a time.  14 BY MR. GREIM:  15 <b>Q. So here's my question.</b>  16 MR. HARMON: Translate that first, and  17 then ask the question.  18 MR. GREIM: Okay.  19 VIDEOGRAPHER: Counsel --  20 MR. GREIM: Okay. Let's --  21 VIDEOGRAPHER: -- you have two minutes.  22 MR. GREIM: Let's do that. Let's  23 translate it and get an answer.  24 BY MR. GREIM:  25 <b>Q. So here's my question: Did you know</b></p>	<p>1 Guo Wengui  2 CONTINUED EXAMINATION  3 BY MR. GREIM:  4 <b>Q. Mr. Guo, I want to follow up on a few</b>  5 <b>questions from before our break.</b>  6 <b>I believe I heard you say that Lianchao</b>  7 <b>Han had extended a personal loan guarantee; is</b>  8 <b>that correct?</b>  9 MR. HARMON: Object to the form of the  10 question.  11 MR. GRENDI: Object to the form of the  12 question.  13 A. I think the lawyer is trying to bait  14 me.  15 CHECK INTERPRETER: No. I think he  16 said "cited me wrongly."  17 A. Cite me wrongly.  18 What I said was, Mr. Han Lianchao told me  19 that, "I saw the information with my own eyes, and  20 I can personally guarantee that they have the  21 ability to perform the job."  22 So no money was involved.  23 BY MR. GREIM:  24 <b>Q. And does all of the information you</b>  25 <b>have about Ms. Wallop's interaction with Lianchao</b></p>
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<p><b>Guo Wengui</b></p> <p><b>Han come from Mr. Han's statements to you?</b></p> <p>A. I need to listen to the question one more time. I did not hear it clearly.</p> <p>MR. GREIM: I think I will just ask the translator to just repeat it.</p> <p>MR. HARMON: I think you'd probably be better off rephrasing it. It's a difficult question to follow. If you can.</p> <p>MR. GREIM: Okay.</p> <p>MR. HARMON: Thank you.</p> <p>BY MR. GREIM:</p> <p><b>Q. You testified earlier about several interactions between Ms. Wallop and Mr. Lianchao Han.</b></p> <p><b>Do you recall that testimony?</b></p> <p>A. Yes.</p> <p><b>Q. And does the information you conveyed to us come to you from Mr. Lianchao Han?</b></p> <p>A. Yes.</p> <p><b>Q. In a meeting in your apartment, did you show French Wallop and Mike Waller the 15 names on paper?</b></p> <p>A. No.</p> <p><b>Q. Did you explain to French Wallop and</b></p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>information to be disclosed to CNN or Wall Street Journal to try to confuse the public.</p> <p><b>Q. Were you present when the 15 names -- let me strike that.</b></p> <p><b>Were you present when Yvette Wang discussed the 15 names with French Wallop or Mike Waller?</b></p> <p>MR. HARMON: Object to the form of the question.</p> <p>A. No.</p> <p>BY MR. GREIM:</p> <p><b>Q. I'm handing you an exhibit which we marked as Exhibit 12 in the deposition of Yvette Wang and Eastern Profit.</b></p> <p><b>(Exhibit 12, document indexed SVUS000171 through SVUS000259, previously marked for identification.)</b></p> <p>MR. HARMON: Do you have a copy of that for me?</p> <p>MR. GREIM: I'm sorry (handing).</p> <p>A. So all these 15 names here (indicating)?</p> <p>MR. HARMON: No question.</p> <p>BY MR. GREIM:</p>
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<p><b>Guo Wengui</b></p> <p>A. Because today is my deposition, so I wanted to figure out the timing, the time for the meeting.</p> <p><b>Q. What else did you do to prepare for your deposition today?</b></p> <p>A. No, nothing else.</p> <p><b>Q. Did you confer with Yvette Wang in preparation for your deposition today?</b></p> <p>A. No.</p> <p><b>Q. Have you read the transcript of Yvette Wang's deposition?</b></p> <p>A. No.</p> <p><b>Q. Have you read the transcript of Ms. Wallop's or Mr. Waller's depositions?</b></p> <p>A. No. I did not have time, and I did not want to ruin my mood by reading the transcripts.</p> <p><b>Q. Have you posted images or transcript sections from Ms. Wallop's or Mr. Waller's depositions on the Internet?</b></p> <p>A. No.</p> <p><b>Q. Has someone else done this at your direction?</b></p> <p>A. No.</p> <p><b>Q. You testified earlier -- well, let me</b></p>	<p>12:10</p> <p>12:11</p> <p>12:11</p> <p>12:11</p> <p>12:12</p> <p>12:12</p> <p>12:12</p>	<p>1. is, Mr. Han drafted the contract, the agreement.</p> <p>2. BY MR. GREIM:</p> <p>3. <b>Q. How do you know that?</b></p> <p>4. A. Mr. Han was cheated to buy drinks, to buy dinners for these two liars; and after all the entertainment, he went back to his hotel room and drafted the agreement.</p> <p>5. <b>Q. Was -- is it your belief that Mr. Han was intoxicated when he drafted the agreement?</b></p> <p>6. A. No.</p> <p>7. <b>Q. Are you aware of the law firm of Foley Hoag -- I'm sorry. I'll start again.</b></p> <p>8. <b>Are you aware of the law firm of Foley Hoag providing advice from the drafting of the agreement?</b></p> <p>9. MR. HARMON: Object to the form of the question.</p> <p>10. A. I can't recall.</p> <p>11. BY MR. GREIM:</p> <p>12. <b>Q. Has Foley Hoag served as your counsel in the last two years?</b></p> <p>13. A. No.</p> <p>14. <b>Q. Have you paid Foley Hoag in the last two years?</b></p>	<p>12:16</p> <p>12:16</p> <p>12:16</p> <p>12:16</p> <p>12:17</p> <p>12:17</p> <p>12:17</p> <p>12:17</p>
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# Guo Wengui

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1	Guo Wengui	1	Guo Wengui
2	decision?	2	<b>Q. Have you ever heard of Golden Spring</b>
3	INTERPRETER: Involved.	3	<b>New York Limited?</b>
4	MR. GREIM: Involved.	4	A. Yes, I've heard of it.
5	CHECK INTERPRETER: Okay.	5	<b>Q. What is it?</b>
6	BY MR. GREIM:	6	A. It's a family fund company in New York.
7	<b>Q. How old is Ms. Wang, by the way?</b>	7	<b>Q. What do you mean by "family fund</b>
8	A. Ms. Wang, right? Ms. Wang. I don't	8	<b>company"?</b>
9	know. I honestly don't know.	9	A. I don't know.
10	<b>Q. Does she work for you?</b>	10	<b>Q. Well, does it do work for a particular</b>
11	A. No.	11	<b>family?</b>
12	<b>Q. Who does she work for?</b>	12	A. Now, I don't know.
13	A. We used to work together. We once	13	<b>Q. Did it at one time?</b>
14	worked together.	14	A. At one time, yes.
15	<b>Q. What do you mean by that?</b>	15	<b>Q. What family?</b>
16	A. We worked in the same company, but she	16	A. Once, I was one of the families that
17	did not work for me.	17	they worked for, once.
18	<b>Q. What company was that?</b>	18	<b>Q. The Guo family?</b>
19	A. Beijing Pangu (phonetic) hire Nu Yer	19	A. Yes, the Guo family. Yes.
20	Chin Chen (phonetic).	20	<b>Q. Did it work for other families at that</b>
21	<b>Q. Where does she work now?</b>	21	<b>same time?</b>
22	A. She's doing a lot of work. She's	22	A. I don't know.
23	currently doing a lot of work to overthrow the	23	<b>Q. When is the last time you had contact</b>
24	Chinese government and to rescue herself from the	24	<b>with any officer or employee of Golden Spring New</b>
25	Communist Party.	25	<b>York Limited?</b>
	Page 82		Page 84
1	Guo Wengui	1	<b>Guo Wengui</b>
2	<b>Q. For whom does she work now?</b>	2	MR. HARMON: Object to the form of the
3	A. I don't know.	3	question.
4	<b>Q. When did you last see her before today?</b>	4	A. I don't remember.
5	A. I saw her yesterday.	5	BY MR. GREIM:
6	<b>Q. Do you see her every day?</b>	6	<b>Q. Can you identify the person sitting</b>
7	A. No.	7	<b>four people down at the table, wearing a nice blue</b>
8	<b>Q. How often do you see her?</b>	8	<b>suit and a tie?</b>
9	A. I can't describe. I can't describe. I	9	A. I call him a young guy, a young pal. I
10	mean -- sometimes not once for a few months,	10	think I vaguely know his name, but -- his name,
11	sometimes a few times per week.	11	the English name.
12	<b>Q. Where did you see her yesterday?</b>	12	<b>Q. What is his English name?</b>
13	A. At a fund company.	13	A. I don't know.
14	<b>Q. What company was that?</b>	14	<b>Q. Is he your attorney?</b>
15	A. It's a company located in New York.	15	A. No.
16	<b>Q. What is the name of the company, sir?</b>	16	MR. HARMON: Object to the form of the
17	A. This company has many names, so I don't	17	question.
18	know exactly what the name is. I know one of the	18	BY MR. GREIM:
19	names is Rule of Law Fund.	19	<b>Q. Do you know why he's here?</b>
20	<b>Q. Does she work there?</b>	20	A. I don't know.
21	A. Well, I don't know.	21	<b>Q. Is he general counsel for Golden Spring</b>
22	<b>Q. Does she work for a company called</b>	22	<b>Limited New York -- I'm sorry. Let me just ask it</b>
23	<b>Golden Spring New York Limited?</b>	23	<b>again.</b>
24	A. Limited, I don't know. I'm not quite	24	<b>Is he general counsel for Golden Spring</b>
25	sure.	25	<b>New York Limited?</b>
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<p>1 <b>Guo Wengui</b></p> <p>2 A. I don't know.</p> <p>3 <b>Q. Well, when is the last time you spoke</b></p> <p>4 <b>with him?</b></p> <p>5 INTERPRETER: You mean this gentleman 12:48</p> <p>6 (indicating)?</p> <p>7 MR. GREIM: Yes.</p> <p>8 A. One hour ago.</p> <p>9 BY MR. GREIM:</p> <p>10 <b>Q. Did he give you legal advice?</b> 12:48</p> <p>11 MR. HARMON: Object to the form of the</p> <p>12 question.</p> <p>13 A. No.</p> <p>14 BY MR. GREIM:</p> <p>15 <b>Q. Did you ask for legal advice?</b> 12:48</p> <p>16 MR. HARMON: An hour ago? Or ever?</p> <p>17 BY MR. GREIM:</p> <p>18 <b>Q. An hour ago.</b></p> <p>19 A. No.</p> <p>20 <b>Q. Mr. Guo, is he or is he not your</b> 12:48</p> <p>21 <b>attorney?</b></p> <p>22 MR. HARMON: Object to the form of the</p> <p>23 question.</p> <p>24 A. He's not my attorney.</p> <p>25 MR. GREIM: Well, that being the case, 12:49</p>	<p>1 <b>Guo Wengui</b></p> <p>2 Mr. Guo. You asked, is he your attorney? And you</p> <p>3 may think -- you may think that that's a subtle</p> <p>4 difference or no difference at all, but I don't.</p> <p>5 And -- so I suggest that we finish up the last 12:50</p> <p>6 15 minutes, or 10 minutes, whatever we have left</p> <p>7 of this tape, and we can deal with it later. But</p> <p>8 let's make use of our time.</p> <p>9 MR. GREIM: Well, I will ask that</p> <p>10 question. 12:50</p> <p>11 BY MR. GREIM:</p> <p>12 <b>Q. Did you understand what your attorney</b></p> <p>13 <b>said just now?</b></p> <p>14 MR. HARMON: You want it to be</p> <p>15 translated? Then we should have everything I said 12:50</p> <p>16 translated for the witness.</p> <p>17 MR. GREIM: Let me do this. We</p> <p>18 won't -- I won't do it that way, because</p> <p>19 otherwise -- I don't think he -- let me -- I'll</p> <p>20 pose a question. 12:50</p> <p>21 MR. HARMON: No. We've had this</p> <p>22 discussion on the record. I want the witness to</p> <p>23 know exactly what was said on the record before we</p> <p>24 continue.</p> <p>25 INTERPRETER: I will try my best to 12:50</p>
Page 86	Page 88
<p>1 <b>Guo Wengui</b></p> <p>2 I don't think that he can be here. He's not</p> <p>3 representing anyone at this -- in this proceeding.</p> <p>4 MR. HARMON: So we've been -- we've</p> <p>5 been at this now for two hours, two and a half 12:49</p> <p>6 hours, two hours and 40 minutes, and now you're</p> <p>7 getting to a question of who is here and why they</p> <p>8 are here? Let's finish up this session, and then</p> <p>9 we'll deal with those questions.</p> <p>10 MR. GREIM: Well, I -- 12:49</p> <p>11 MR. HARMON: You're asking him to</p> <p>12 leave?</p> <p>13 MR. GREIM: I --</p> <p>14 MR. HARMON: Are you asking him to</p> <p>15 leave? 12:49</p> <p>16 MR. GREIM: I'm going to ask him to</p> <p>17 leave if he's not actually representing someone</p> <p>18 here. It's an important point. I believed that,</p> <p>19 when we started, he represented Mr. Guo. Mr. Guo</p> <p>20 has now sworn under oath he does not. 12:49</p> <p>21 MR. HARMON: He did not say that. He</p> <p>22 said he's not his attorney, because that's the</p> <p>23 question you asked -- Is he your attorney? -- that</p> <p>24 was the question you asked. You didn't ask</p> <p>25 whether or not he provides legal advice to 12:49</p>	<p>1 <b>Guo Wengui</b></p> <p>2 recall it. I did not write it down, but I recall</p> <p>3 most of it.</p> <p>4 (Interpreter interprets colloquy.)</p> <p>5 BY MR. GREIM: 12:50</p> <p>6 <b>Q. Does this gentleman that we've been</b></p> <p>7 <b>speaking about, with the blue suit and nice tie,</b></p> <p>8 <b>provide you legal advice?</b></p> <p>9 A. I need it now. I need it now.</p> <p>10 <b>Q. Let me rephrase. I don't think I</b> 12:52</p> <p>11 <b>understand your answer.</b></p> <p>12 <b>Does this gentleman in the blue suit</b></p> <p>13 <b>provide you legal advice?</b></p> <p>14 MR. GRENDI: Object to the form.</p> <p>15 A. So you mean does he provide -- so I'm 12:53</p> <p>16 saying "does," meaning, are you talking about two</p> <p>17 hours ago, one hour ago, or at this moment?</p> <p>18 BY MR. GREIM:</p> <p>19 <b>Q. How about has he ever?</b></p> <p>20 A. So I think your statement is highly</p> <p>21 irresponsible. I cannot answer this question.</p> <p>22 There is no way for me to answer this question,</p> <p>23 because this is not relevant to my deposition</p> <p>24 today. So I don't know how to answer this</p> <p>25 question. I think the reason I'm here today, the 12:53</p>

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<p>1 Guo Wengui  2 <b>Q. And do you see that the next three</b>  3 <b>pages are all about Guan Jun?</b>  4 A. So you want me to go through the three  5 pages? 01:59  6 <b>Q. Yes.</b>  7 A. So 16 -- page 16 and 17, only two  8 pages.  9 <b>Q. Okay. What about page 18? Does that</b>  10 <b>have to do with Guan Jun?</b> 01:59  11 A. I don't know. I don't know. Page 18,  12 I don't know.  13 <b>Q. By the way, Mr. Guo, I noticed you</b>  14 <b>outside of our conference room during the break;</b>  15 <b>and I just wanted to ask you, did you have a</b> 02:00  16 <b>chance to look through this exhibit during our</b>  17 <b>lunch break?</b>  18 A. No.  19 <b>Q. Let me ask you, then, have you seen</b>  20 <b>pages 15 through 18 before?</b> 02:00  21 A. Yes. It's everywhere on the Internet.  22 <b>Q. Do you have any objection to those</b>  23 <b>pages being publicly disclosed in this case?</b>  24 MR. HARMON: Object to the form of the  25 question. 02:00</p>	<p>1 Guo Wengui  2 you mean by "role"?  3 <b>Q. Did you help to recommend any of the</b>  4 <b>names for Strategic Vision to research?</b>  5 A. I don't remember. 02:03  6 <b>Q. If Ms. Wang testified that you did,</b>  7 <b>would you disagree with her?</b>  8 MR. HARMON: Object to the form of the  9 question.  10 A. I don't answer a hypothetical question. 02:04  11 I do not answer any "if" question.  12 BY MR. GREIM:  13 <b>Q. Well, "if" questions can be answered in</b>  14 <b>a case. And so I want you -- I want to -- I'm</b>  15 <b>going to reask you and see what your answer is.</b> 02:04  16 <b>If Ms. Wang testified that the names --</b>  17 <b>the 15 names came from you, would you disagree</b>  18 <b>with that?</b>  19 MR. GRENDI: Object to the form.  20 MR. HARMON: So I object to the form of 02:04  21 the question. And I would -- I would ask you,  22 Mr. Greim, please not to give my client advice or  23 directions about the law.  24 The question was asked. I object to the  25 form. He should answer the question, if he can. 02:04</p>
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<p>1 Guo Wengui  2 15 names, what all those 15 names are. All I can  3 answer is based on the four names that we already  4 discussed.  5 BY MR. GREIM: 02:07  6 <b>Q. Okay. Then, we will go through each of</b>  7 <b>the names.</b>  8 A. Okay.  9 <b>Q. Please look at page -- pages 19 through</b>  10 <b>25.</b> 02:07  11 A. Where's 19? 19 to 25. These two like  12 1 and 7. So it looks like a 7. 19 to 25, that's  13 why I repeat it.  14 So you want to go through it one by one,  15 page by page? 02:08  16 <b>Q. What name do you see on page 19, sir?</b>  17 A. Fu Weihua.  18 <b>Q. And is it apparent to you that pages 19</b>  19 <b>through 25 all pertain to Fu Weihua?</b>  20 A. I'm only looking at page 19 right now. 02:09  21 I cannot answer a question -- do you allow me to  22 read through 19 and 25?  23 <b>Q. Yes.</b>  24 MR. HARMON: While the witness is doing  25 that, several of the questions and answers leading 02:09</p>	<p>1 Guo Wengui  2 BY MR. GREIM:  3 <b>Q. Who assembled pages 19 through 25?</b>  4 A. I don't know.  5 <b>Q. Do you have any objection to making</b>  6 <b>public in this case pages 19 through 25?</b> 02:11  7 A. I don't know. I can't answer this  8 question.  9 <b>Q. If you need to review the pages, please</b>  10 <b>do, to answer it.</b> 02:11  11 A. I have no objection to the name of Fu  12 Weihua; however, the remaining information, I  13 don't know.  14 <b>Q. Please take a second to look at those</b>  15 <b>other pages and tell me if you have an objection.</b> 02:11  16 A. (Witness reviews document.) Regarding  17 the name, regarding the content, the following  18 information, I have no objection.  19 <b>Q. Please turn to page 26.</b>  20 <b>Whose name do you see there?</b> 02:12  21 A. Meng Haijing.  22 <b>Q. Do you know who that is?</b>  23 A. Yes.  24 <b>Q. Who is it?</b>  25 A. So she's the daughter of -- she's the 02:13</p>
<p style="text-align: center;">Page 98</p> <p>1 Guo Wengui  2 up to these questions on page 19 of the exhibit  3 said four individuals, but we've only been through  4 three.  5 MR. GREIM: Because at that point, we 02:09  6 were on page 19.  7 MR. HARMON: I'm not -- I'm just saying  8 that we had only been through three people, even  9 though the questions and answers had to do with  10 four. 02:09  11 MR. GREIM: It included this page, this  12 number four. Now we're moving into --  13 MR. HARMON: I'm not sure that that's  14 so, but I just want it to be clear for the record.  15 It will say what it says. 02:09  16 A. I know this person. I make the  17 recommendation of this person.  18 BY MR. GREIM:  19 <b>Q. Thank you.</b>  20 <b>Now, the pending question is, do pages 19</b> 02:10  21 <b>through 25 appear to relate to Weihua Fu?</b>  22 MR. GRENDI: Object to the form.  23 A. I don't remember all those following  24 pages, but I made the recommendation about Fu  25 Weihua. 02:10</p>	<p style="text-align: center;">Page 100</p> <p>1 Guo Wengui  2 daughter of a -- of intelligence head in China and  3 also the secretary of China's political and legal  4 commission.  5 <b>Q. If you could, you'll see that the next</b> 02:13  6 <b>section starts on page 39. So I want to now ask</b>  7 <b>you about pages 26 to 38.</b>  8 A. Thirty-eight. Page 38.  9 <b>Q. My -- my question will be, do you know</b>  10 <b>who compiled these pages?</b> 02:14  11 A. It's all over the Internet.  12 <b>Q. Have you seen these pages before?</b>  13 A. I've seen content, this content, many,  14 many times.  15 <b>Q. Do you have any objection to public</b>  16 <b>disclosure of these pages in this litigation?</b> 02:14  17 A. I don't have any suggestion. I neither  18 object nor endorse the disclosure of this  19 information.  20 <b>Q. Did you recommend the name of Meng</b> 02:15  21 <b>Haijing to Yvette Wang?</b>  22 MR. GRENDI: Object to the form.  23 Go ahead.  24 A. I did not provide any names. All I did  25 was to make the recommendation regarding who we 02:15</p>

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<p>1 Guo Wengui</p> <p>2 <b>Q. Do you know the identity of any officer</b></p> <p>3 <b>or director of Eastern Profit?</b></p> <p>4 A. I don't know.</p> <p>5 <b>Q. What's your daughter's name? (DIR)</b> 02:30</p> <p>6 MR. HARMON: Direct the witness not to</p> <p>7 answer.</p> <p>8 A. I refuse to answer.</p> <p>9 BY MR. GREIM:</p> <p>10 <b>Q. Is your daughter a director -- in fact,</b> 02:30</p> <p>11 <b>is your daughter the sole director of Eastern</b></p> <p>12 <b>Profit?</b></p> <p>13 A. If you can guarantee that if we -- if I</p> <p>14 release this information and then she won't get</p> <p>15 killed, she won't get persecuted by the Chinese</p> <p>16 Communist Party, then I can tell you information.</p> <p>17 But can you guarantee that.</p> <p>18 CHECK INTERPRETER: And all that. So</p> <p>19 information today, if I tell you whatever, it's</p> <p>20 not going to be leaked. 02:31</p> <p>21 A. And also, the two clients, would they</p> <p>22 use this information as a way to threaten me?</p> <p>23 BY MR. GREIM:</p> <p>24 <b>Q. Mr. Guo, are you aware that this</b></p> <p>25 <b>information is available in public archives in</b> 02:31</p>	<p>1 Guo Wengui</p> <p>2 confidential or whether it is otherwise public.</p> <p>3 And we'll talk with you at that time. And if we</p> <p>4 disagree, we will take it to the judge. But there</p> <p>5 is not a super protective order above and beyond</p> <p>6 the protective order that all the parties have</p> <p>7 entered into.</p> <p>8 MR. HARMON: I understand what you</p> <p>9 said. And in light of that, I'm going to say that</p> <p>10 the witness has provided you the only answer</p> <p>11 you're going to get on these questions today until</p> <p>12 his assurances can be met.</p> <p>13 MR. GREIM: All right. So are you</p> <p>14 instructing the witness not to answer the</p> <p>15 question? 02:33</p> <p>16 MR. HARMON: I think you've gotten the</p> <p>17 only answer from the witness that you're going to</p> <p>18 get. He's answered the question. He's answered</p> <p>19 the question by asking you to assure that the</p> <p>20 information will be -- not be leaked, that it will</p> <p>21 be subject to the confidentiality order and</p> <p>22 maintained as confidential. And if you can't</p> <p>23 provide that assurance, then we should move on to</p> <p>24 the next question.</p> <p>25 MR. GREIM: That is not what the 02:33</p>
<p>Page 110</p> <p>1 <b>Guo Wengui</b></p> <p>2 <b>Hong Kong?</b></p> <p>3 A. That, I don't know.</p> <p>4 <b>Q. I'm going to ask you to answer the</b></p> <p>5 <b>question.</b> 02:32</p> <p>6 <b>Is your daughter, or is she not, a</b></p> <p>7 <b>director of Eastern Profit?</b></p> <p>8 MR. HARMON: Are you going to provide</p> <p>9 the guarantees that Mr. Guo has asked for?</p> <p>10 MR. GREIM: I'm not making any promises</p> <p>11 about leaks to the Communist Party. There is a</p> <p>12 protective order that covers this case, which</p> <p>13 governs us. It would protect this information</p> <p>14 like everything else. The witness cannot -- I'll</p> <p>15 leave it at that. 02:32</p> <p>16 MR. HARMON: So if he answers the</p> <p>17 question, then you agree that the information is</p> <p>18 subject to the confidentiality order and that</p> <p>19 nobody associated with this case will release the</p> <p>20 information. 02:32</p> <p>21 Is that what you're saying.</p> <p>22 MR. GREIM: I would ask you to make the</p> <p>23 designation within the first 21 days after the</p> <p>24 transcript is finalized, for the protective order.</p> <p>25 We will then consider whether this information is</p>	<p>Page 112</p> <p>1 Guo Wengui</p> <p>2 witness has asked me. The protective order</p> <p>3 governs this deposition. We are going to comply</p> <p>4 with the protective order. I'm not going to make</p> <p>5 promises that go beyond the protective order.</p> <p>6 MR. HARMON: I understand what you</p> <p>7 said. And what you said is that you leave open</p> <p>8 for yourself the right to seek to disseminate the</p> <p>9 information. That is anathema to the witness.</p> <p>10 He's made that clear. So he's not going to</p> <p>11 provide any further answers on this. Let's move</p> <p>12 on.</p> <p>13 INTERPRETER: So should I at least</p> <p>14 summarize?</p> <p>15 MR. GREIM: Go ahead. Summarize so the</p> <p>16 witness can hear all this.</p> <p>17 INTERPRETER: (Interpreter summarizes</p> <p>18 colloquy.)</p> <p>19 BY MR. GREIM:</p> <p>20 <b>Q. Is Han Chunguang a director of Eastern</b></p> <p>21 <b>Profit?</b></p> <p>22 A. Probably, but I can't be sure.</p> <p>23 <b>Q. Why do you say "probably"?</b></p> <p>24 A. So he's independent of me. He's</p> <p>25 independent. Why would I know? Why would I know? 02:35</p>

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Guo Wengui  
August 2, 2019

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<p>1 Guo Wengui 2 twitters of the two clients. 3 4 <b>Q. Okay. Let's now turn to -- by the way,</b> 5 <b>have you seen pages 42 through 44 before today?</b> 6 A. It's public information. It's 7 everywhere. 8 9 <b>Q. If that is true, sir, how can any harm</b> 10 <b>come from disclosing those pages?</b> 11 MR. HARMON: Object to the form of the 12 question. 13 A. You ask a good question. So, 14 precisely, currently, in Xinjiang, we know that. 15 We know a lot of people I know in Xinjiang, bad 16 things are happening. However, if we have a 17 specific person getting in front of the line, 18 telling that, okay, me, certain people, certain 19 person, are accusing the Chinese government of 20 doing certain things -- 21 22 CHECK INTERPRETER: No. Chinese 23 Communist Party. 24 A. -- that person -- 25 CHECK INTERPRETER: Chinese Communist Party. A. -- Chinese Communist Party, that person will get killed right away.</p>	<p>02:59</p>	<p>1 2 <b>Guo Wengui</b> 3 MR. HARMON: Asked and answered. 4 Do it again. 5 A. Because Ms. Wang and her family members 6 are victims. They are being threatened. 7 BY MR. GREIM: 8 9 <b>Q. But how could you be sure that Eastern</b> 10 <b>Profit would follow Ms. Wang's advice?</b> 11 MR. GRENDI: Objection to the form. 12 MR. HARMON: Join. 13 A. I could not be sure. 14 BY MR. GREIM: 15 16 <b>Q. And your testimony today is that you</b> 17 <b>have no idea who controls Eastern Profit?</b> 18 A. You're right. 19 20 <b>Q. Was it important to you to know who was</b> 21 <b>paying Yvette Wang before you gave her this</b> 22 <b>recommendation?</b> 23 MR. HARMON: Object to the form of the question. 24 MR. GRENDI: Objection to the form. 25 A. What do you mean by pay? Pay money? BY MR. GREIM: Q. Yes. MR. HARMON: Object to the form of the</p>	<p>03:02</p>	<p>03:03</p>
<p>Page 126</p>				<p>Page 128</p>
<p>1 2 Guo Wengui 3 It's the same story here. We all know -- 4 people around the world know what kind of evil 5 deeds the Chinese Communist Party is doing; 6 however, if I come out there as an individual and 7 make this statement as an individual, on a 8 personal level, then I myself will get killed. 9 Anybody who dares to make that personal statement 10 will get killed. That's why your clients are very 11 evil, in the sense that they are threatening to 12 release those two -- relevant information, to get 13 us killed. 14 BY MR. GREIM: 15 16 <b>Q. Do you know -- do you know why Eastern</b> 17 <b>Profit wanted to investigate person number 7, Tian</b> 18 <b>Ding?</b> 19 A. No, I don't know. 20 21 <b>Q. Did you have any concern, when you</b> 22 <b>provided this recommendation to Yvette Wang, that</b> 23 <b>Eastern Profit would use the investigation results</b> 24 <b>for purposes that were at odds with yours?</b> 25 MR. GRENDI: Objection to the form. A. I was not worried. BY MR. GREIM: Q. Why not?</p>	<p>03:00</p>	<p>1 2 Guo Wengui 3 question. 4 5 INTERPRETER: I'll repeat the question. 6 Was it important to know who was paying Ms. Wang 7 before you make the recommendation? That's the 8 question, right? 9 MR. GREIM: Correct. 10 11 CHECK INTERPRETER: He said that he 12 doesn't understand the question. 13 14 INTERPRETER: He doesn't understand the 15 question. 16 BY MR. GREIM: 17 18 <b>Q. You recommended person number 7 to</b> 19 <b>Yvette Wang, correct?</b> 20 A. Yes. 21 22 <b>Q. Did you know what she was going to do</b> 23 <b>with the information?</b> 24 A. I didn't know. 25 26 <b>Q. Did you know she was going to share it</b> 27 <b>with Eastern Profit?</b> 28 MR. HARMON: Object to the form of the question. 29 MR. GRENDI: Objection to the form. 30 A. I didn't know. 31 BY MR. GREIM:</p>	<p>03:04</p>	<p>03:04</p>

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<p>1 Guo Wengui  2 <b>Q. Did you know that she was working with</b>  3 <b>Eastern Profit?</b>  4 A. I didn't know.  5 CHECK INTERPRETER: Counsel, are you 03:05  6 asking does the witness know, or are you asking  7 whether he knows?  8 MR. GREIM: He is the witness.  9 CHECK INTERPRETER: Yes. So you're 03:05  10 asking, does he know whether he knows, or if he  11 knows? You're asking --  12 MR. GREIM: I don't think I understand  13 your question. I think my question was clear. I  14 think I got an answer.  15 CHECK INTERPRETER: Yes, because I feel 03:06  16 like that -- never mind.  17 MR. HARMON: Let's move on.  18 BY MR. GREIM:  19 <b>Q. At the time you gave this information</b>  20 <b>to Yvette Wang, did you know who her employer was?</b> 03:06  21 MR. HARMON: Object to the form of the  22 question.  23 A. I did not know.  24 BY MR. GREIM:  25 <b>Q. Did you -- at the time you gave this</b> 03:06</p>	<p>1 Guo Wengui  2 president of Chinese Commerce Bank -- Bank of --  3 Commerce Bank.  4 <b>Q. Is he any relation to person number 7,</b> 03:09  5 <b>Tian Ding?</b>  6 A. I don't know. They're probably  7 friends. I don't know.  8 <b>Q. Did you recommend number 8 to Mrs. --</b>  9 <b>I'm sorry -- Ms. Wang?</b>  10 A. I did make the recommendation. 03:09  11 <b>Q. Why?</b>  12 A. To investigate Wang Qishan and his  13 father, and he himself, you know, the kind of  14 wealth that they have stolen from the Chinese  15 people. 03:09  16 <b>Q. Is -- do you have any objection to the</b>  17 <b>disclosure of pages 45 through 49, as well as</b>  18 <b>page 47, in this case?</b>  19 A. I object 100 percent.  20 <b>Q. Why?</b>  21 A. Same reason. If Wang Qishan finds out 03:10  22 about this, my family members, family members of  23 Ms. Wang, get killed.  24 <b>Q. Does Ms. Wang have two family members</b>  25 <b>who are police in Hong Kong?</b> 03:11</p>
<p style="text-align: center;">Page 130</p> <p>1 <b>Guo Wengui</b>  2 <b>information to Yvette Wang, did you know whether</b>  3 <b>she was receiving a salary or any kind of payment</b>  4 <b>from any other person?</b>  5 MR. HARMON: Object to the form of the 03:06  6 question.  7 MR. GRENDI: Object to the form.  8 A. I did not know.  9 BY MR. GREIM:  10 <b>Q. Let's turn to person number 8, on</b> 03:07  11 <b>page 45. And, sir, you'll see that pages 45, 46,</b>  12 <b>48, and 49 follow, and page 47 is missing.</b>  13 A. I did not notice.  14 <b>Q. And -- well, if you look right before</b>  15 <b>page 45, you'll see that page 47 is before it.</b> 03:07  16 A. Oh, okay.  17 <b>Q. And you'll see -- well, I just want to</b>  18 <b>draw that to your attention before we go into</b>  19 <b>these. I just noticed it myself.</b>  20 <b>Now, my question is, what name is next to</b> 03:08  21 <b>number 8?</b>  22 A. Tian Yuanan.  23 <b>Q. Who is that?</b>  24 A. He was the other secretary of Mr. Wang  25 Qishan. He's actually the son of the current 03:08</p>	<p>1 <b>Guo Wengui</b>  2 MR. HARMON: Object to the form of the  3 question.  4 A. I don't know. If you know that  5 information, I will be interested to know if they 03:11  6 have two family members of police in Hong Kong.  7 This is the first time I've heard of it. I think  8 you're just following the clients by spreading  9 rumors.  10 BY MR. GREIM: 03:11  11 <b>Q. How about in Mainland China?</b>  12 MR. HARMON: Is that a question?  13 A. I don't know.  14 MR. HARMON: Is that a question?  15 MR. GREIM: It was, and he answered. 03:11  16 MR. HARMON: As long as you both  17 understood what the question is.  18 BY MR. GREIM:  19 <b>Q. Okay. Can you please turn to page 50</b>  20 <b>now. And if you could look at pages 50 to 53,</b> 03:12  21 <b>we'll treat those together.</b>  22 <b>Who is the person listed as number 9?</b>  23 A. Zhou Lei.  24 <b>Q. Who is that person?</b>  25 A. I don't know. 03:12</p>

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<p><b>Guo Wengui</b></p> <p>A. No.</p> <p><b>Q. Was the real estate to be for Mrs. Wang?</b></p> <p>INTERPRETER: Sorry. Say that again. 05:04</p> <p>BY MR. GREIM:</p> <p><b>Q. Was the real estate to be for Mrs. Wang?</b></p> <p>A. I don't know. I don't know.</p> <p>INTERPRETER: Could be imagination, he said. 05:04</p> <p>BY MR. GREIM:</p> <p><b>Q. Do you recall Strategic Vision asking for a \$1 million deposit in advance of the contract?</b> 05:05</p> <p>A. I don't remember.</p> <p><b>Q. Do you recall Strategic Vision receiving a \$1 million deposit in advance of the contract?</b></p> <p>A. Yes, I know. I'm aware. 05:05</p> <p><b>Q. Do you know how Eastern Profit came up with the money to pay the million-dollar deposit?</b></p> <p>A. I don't know.</p> <p><b>Q. Did you order a release of \$1 million to pay the deposit to Strategic Vision?</b> 05:05</p>	<p><b>Guo Wengui</b></p> <p>INTERPRETER: He wants me to repeat the name of the company. (Interpreter repeats.)</p> <p>MR. GREIM: Capital Group.</p> <p>A. I cannot be 100 percent sure, because there are so many ACA -- companies with the name of ACA. 05:27</p> <p>BY MR. GREIM:</p> <p><b>Q. Well, do you know who wired the million dollars under this contract to Strategic Vision?</b> 05:27</p> <p>A. All I know is there's a company called ACA Management Company. So I'm not sure it's actually the same with the one you referred to here.</p> <p><b>Q. What do you know about ACA Management Company?</b> 05:28</p> <p>A. So just a person you mentioned earlier, William Zhi (phonetic). He's actually an officer of this company, and I know it because we are doing the same cause, which is to overthrow the Chinese Communist Party. 05:28</p> <p><b>Q. Is William Zhi (phonetic) a longtime friend of yours?</b></p> <p>A. Probably long time, but exactly how long, I cannot be sure. 05:29</p>
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<p><b>Guo Wengui</b></p> <p><b>work on your behalf?</b></p> <p>A. I don't know.</p> <p><b>Q. Well, now I'm going to go back, and I'm going to -- you say you don't know. I'm going to ask you again.</b></p> <p><b>Did it wire the million dollars to Williams and Connolly in September of 2017 to work on your asylum case? (DIR)</b></p> <p>MR. HARMON: Direct the witness not to answer.</p> <p>A. I refuse to answer this question.</p> <p>MR. GREIM: You are blocking my ability to show that Mr. Guo actually exercises control over ACA and uses its funds for his own personal purposes.</p> <p>MR. HARMON: There's no question pending.</p> <p>INTERPRETER: Are you a judge? I mean, can you make that decision?</p> <p>A. This is completely in the style of the Chinese Communist Party; resort to threat and similar to the clients.</p> <p>BY MR. GREIM:</p> <p><b>Q. Did there come a time when Eastern</b></p>	<p>05:46</p> <p>05:47</p> <p>05:47</p> <p>05:47</p> <p>05:47</p> <p>05:47</p> <p>05:47</p> <p>05:47</p> <p>05:48</p>	<p><b>Guo Wengui</b></p> <p><b>A. He's not providing any services to me.</b></p> <p><b>Q. Why does he come to your building?</b></p> <p>A. I don't know.</p> <p><b>Q. Have you ever given him any direction?</b></p> <p>MR. HARMON: Object to the form of the question.</p> <p>MR. GREIM: Object to the form.</p> <p>A. No.</p> <p>BY MR. GREIM:</p> <p><b>Q. Who is his employer?</b></p> <p>A. I don't know.</p> <p><b>Q. Do you know who assigns him work?</b></p> <p>MR. HARMON: Object to the form of the question.</p> <p>MR. GREIM: Object to the form.</p> <p>A. I don't know.</p> <p>BY MR. GREIM:</p> <p><b>Q. Have you ever seen him performing any kind of work in your building?</b></p> <p>A. I don't know what you mean by "services." What are the standards of service? What do you mean by service? I don't understand.</p> <p><b>Q. Does he come to your building for leisure and entertainment, or does he come to</b></p>	<p>05:50</p> <p>05:51</p> <p>05:51</p> <p>05:51</p> <p>05:51</p> <p>05:51</p> <p>05:51</p> <p>05:51</p>
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<p><b>Guo Wengui</b></p> <p>A. Based on the kind of news that they released on the media.</p> <p><b>Q. I'm sorry.</b></p> <p><b>That who released on the media?</b> 06:07</p> <p>A. Your clients.</p> <p><b>Q. Have you conferred with Eastern Profit about whether it repaid the million dollars?</b></p> <p>MR. GRENDI: Objection.</p> <p>A. I don't remember. 06:08</p> <p>BY MR. GREIM:</p> <p><b>Q. What did you expect Strategic Vision's reports under the contract to include?</b></p> <p>A. So it's pretty much, you know, what your clients told me initially -- to identify, to provide evidence in terms of what kind of crimes that they committed in the U.S., including money laundering; also, to identify the spies embedded in the U.S. so that we can rescue the Chinese people and to -- to rescue the Chinese people. 06:09</p> <p>CHECK INTERPRETER: And to show them the truth.</p> <p>A. And to show them the truth.</p> <p>BY MR. GREIM:</p> <p><b>Q. What did you expect Strategic Vision's</b> 06:09</p>	<p><b>Guo Wengui</b></p> <p><b>research with anyone else?</b></p> <p>A. The U.S. government and the people of China.</p> <p><b>Q. How did you plan to share the information with the people of China?</b> 06:11</p> <p>A. To release them to the media; to release the information to the media.</p> <p><b>Q. How did you intend to get the information to the U.S. government?</b> 06:11</p> <p>A. Based on the legal procedures of the U.S.</p> <p><b>Q. Do you plan to file a lawsuit with the information?</b></p> <p>A. To answer your question, the plan is to file a lawsuit. 06:12</p> <p><b>Q. Who are you going to sue?</b></p> <p>A. Whoever commits a crime and we have the evidence.</p> <p><b>Q. At some point, did you ask Yvette Wang to tell Strategic Vision that it needed to give you research before January 26, 2018, because you had special plans for that day?</b> 06:14</p> <p>A. I don't remember.</p> <p><b>Q. Do you remember what plans -- special</b> 06:15</p>
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<p><b>Guo Wengui</b></p> <p><b>possible to extract raw data from the private accounts of the 15 subjects?</b></p> <p>A. They never said anything like that. It's baloney. Because it seems to me that whenever they talked to me, they presented themselves as very good at everything. Everything is so easy. They can get their hands on any information. So because they told -- because they always told Han Lianchao -- Lianchao Han that they've been doing this work for a long, long time. Give us something more challenging.</p> <p><b>Q. Did Strategic Vision explain to you that forced entry into a server would be detected and likely provoke defensive measures, defeating the purpose of the work?</b></p> <p>A. This is pure fiction. This is pure fiction. Whenever we talked about the research, I always emphasized the legality. Our measures must be legal. We don't want to do anything illegal. So we never talked about forcing entry into servers. And every time they told me, they keep saying that -- don't worry. We know what's legal, what is legal, and we'll only use legal measures. You don't need to tell us what to do, and we've</p>	<p>06:17</p> <p>06:18</p> <p>06:19</p> <p>06:19</p>	<p><b>Guo Wengui</b></p> <p><b>Q. Did you learn that, after Strategic Vision hired the Texas team, that many of the 15 initial subjects were listed as "record protected" in government databases?</b></p> <p>MR. HARMON: Object to the form of the question.</p> <p>MR. GRENDI: Objection to the form.</p> <p>A. It's completely fiction. It's completely fiction. This is the first time I've ever heard of a Texas team, and I've never heard of it before. It's scary, kind of storytelling, kind of fiction.</p> <p>BY MR. GREIM:</p> <p><b>Q. Did Lianchao tell you that Strategic Vision was asking for different names to research that were not record-protected?</b></p> <p>MR. HARMON: Can you read the question back, please.</p> <p>(Record was read back.)</p> <p>A. Never. Never. It's all fiction. It's all fabrication, or fiction. I'm shocked.</p> <p>BY MR. GREIM:</p> <p><b>Q. Have you ever personally met with a team of Texas investigators?</b></p>	<p>06:22</p>
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<p>Guo Wengui</p> <p>been doing this for a long time. We know what's legal, what we can do.</p> <p><b>Q. Did you ever report those statements from Strategic Vision to anyone at Eastern Profit?</b></p> <p>A. No.</p> <p><b>Q. Was anyone from Eastern Profit present when Strategic Vision made those statements?</b></p> <p>A. No.</p> <p><b>Q. By the beginning of February 2018, had you approved Strategic Vision using a second research team?</b></p> <p>MR. GRENDI: Object to the form.</p> <p>A. I didn't have the authority to approve anything; but, no. So the question is absurd.</p> <p>BY MR. GREIM:</p> <p><b>Q. Okay. Did you learn that Strategic Vision had begun to use a second team based in Texas?</b></p> <p>A. It's all fiction. It's like a movie; it's completely fiction. They don't even have one single employee, so they've given us baloney.</p> <p><b>Q. Did you receive reports from Liancho on Strategic Vision's performance?</b></p> <p>A. No.</p>	<p>06:19</p>	<p><b>Guo Wengui</b></p> <p>A. No. No. This is the first time I've ever heard of a Texas team. I feel like I'm an actor in a movie right now. I feel like this is not a very serious legal matter anymore.</p> <p><b>Q. Were you ultimately dissatisfied with the work that Strategic Vision delivered?</b></p> <p>A. Let me reemphasize, they never provided me with any report, work report. So it's not a matter of whether I'm satisfied with the report or not. It's just pure deception.</p> <p><b>Q. Well, let me ask you this: Are you aware that Mike Waller provided a thumb drive to Yvette Wang in Penn Station with data?</b></p> <p>MR. HARMON: Object to the form of the question.</p> <p>A. So all I know is that Wang told me that all these alleged evidence regarding me suing -- money laundering was nonexistent. All the information was gathered from social media, from the Internet, from Facebook. And then she told me that we've been cheated and there's nothing we can do other than to file a lawsuit.</p> <p>BY MR. GREIM:</p> <p><b>Q. Did you agree with Yvette Wang that a</b></p>	<p>06:24</p>
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<p>1 <b>Guo Wengui</b>  2 <b>lawsuit should be filed?</b>  3 A. I completely agree with her.  4 <b>Q. Did either you or Yvette check with Han</b>  5 <b>Chunguang to obtain his approval before filing the</b> 06:27  6 <b>lawsuit?</b>  7 MR. HARMON: Object to the form of the  8 question.  9 MR. GRENDI: Object to the form of the  10 question. 06:27  11 A. No, I did not. I did not.  12 BY MR. GREIM:  13 <b>Q. Do you know whether Yvette Wang did?</b>  14 A. That, I don't know.  15 <b>Q. Did either you or Yvette Wang check</b> 06:27  16 <b>with your daughter for approval before filing the</b>  17 <b>lawsuit?</b>  18 A. I don't know.  19 <b>Q. Well, do you know whether you checked</b>  20 <b>with your daughter before -- for approval before</b>  21 <b>the lawsuit was filed?</b> 06:28  22 A. I did not file a lawsuit, and I never  23 discussed this matter with my daughter.  24 <b>Q. Do you know what person, who is either</b>  25 <b>an officer, director, employee, or agent of</b> 06:28 </p>	<p>1 <b>Guo Wengui</b>  2 what I said. So what I stated earlier was that,  3 you know, Wang asked me whether we should file a  4 lawsuit, and I told her I completely agree that we  5 should file a lawsuit. So it's not discussion; 06:31  6 it's just agreed.  7 BY MR. GREIM:  8 <b>Q. Was anyone else present for that</b>  9 <b>discussion?</b>  10 A. No. 06:31  11 <b>Q. Do you know -- did anyone inform</b>  12 <b>Lianchao Han about the lawsuit before it was</b>  13 <b>filed?</b>  14 A. I don't know.  15 <b>Q. Did Golden Spring New York Limited have</b> 06:31  16 <b>a role in deciding to file this lawsuit?</b>  17 A. I don't know.  18 <b>Q. Before hiring Strategic Vision --</b>  19 <b>strike that.</b>  20 <b>Before you began your discussions with</b> 06:33  21 <b>Strategic Vision, did you have any experience in</b>  22 <b>hiring companies to investigate subjects?</b>  23 A. I don't know what you mean by  24 "experience," so it's hard for me to answer this  25 question. </p>
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